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European Commission  
1049 Brussels

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Via e-mail

Dear Mr. Petriccione,

**On carbon border tax and climate transition**

I have with great interest noted the commitments the up-coming President of the European Commission Ursula von der Leyen has made as part of her confirmation by the European Parliament.

Specifically, I am thinking about the commitment to extend the Emissions Trading System and also to introduce carbon border tax to avoid carbon leakage. Furthermore, she proposes to start with a number of select sectors.

I would like to propose to you that fertilizers become part of the first selected sectors for a carbon border tax. As you know fertilizers are relatively homogenous products produced with an important carbon emission. Furthermore, there is a direct link between the different fertilizers and ammonia production, which is part of the EU ETS-system, and thus easy to build on in constructing a border tax system within the ETS.

I suggest I contact you for further discussions after the summer holiday.

As to our earlier discussion in March on green ammonia, we have carried out a study on partial add-on of an electrolyser to an existing ammonia plant in 2030. Unfortunately, the economics clearly show that even such a limited step is impossible with the expected prices on electricity. I will also be happy to discuss this report in further detail.

Best regards